

BEFORE THE POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268

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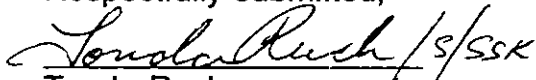
Postal Rate and Fee Changes, 1997

Docket No. R97-1

FIRST SET OF INTERROGATORIES
OF THE NATIONAL NEWSPAPER ASSOCIATION
TO USPS WITNESS SECKAR
(NNA/USPS-T26-1-7)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the National Newspaper Association hereby submits the attached interrogatory to USPS witness Seckar: NNA/USPS-T26, Nos. 1-7. If the designated witness is unable to respond, we request a referral to another witness in possession of the requested information.

Respectfully submitted,

 /s/ssk

Tonda Rush

Senny Boone

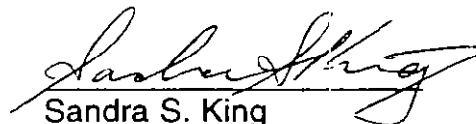
Attorneys

National Newspaper Association

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served the attached document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

Date: September 17, 1997


Sandra S. King

**FIRST SET OF INTERROGATORIES
DIRECTED TO WITNESS SECKAR
NNA/USPS-T26-1-7**

1. Please confirm that DMM § 230.6.4 requires a periodicals mailer, in order to receive the high density rate, to supply at least 125 walk-sequenced addressed pieces for each carrier route or in instances where there are 124 or fewer deliverable addresses to supply 125 pieces anyway or a walk-sequenced address piece for each address.

2. Please consider the following circumstances:

--Weekly newspaper A covering a city zone claims subscribers--or 127 pieces--equaling 30% of Carrier Route A, a city route with 425 deliverable stops: and

--Weekly newspaper B covering a rural route claims subscribers--or 120 pieces--equaling 60% of Carrier Route B, a rural route with 200 deliverable stops.

Please confirm that weekly newspaper A with a lower penetration of readership in its market would receive the lower "high density" postal rate than weekly newspaper B, assuming the mail is properly prepared under DMM requirements.

3. Please provide the average number of stops on city carrier routes and the average number of stops on rural routes.

4. Please provide an estimate of the number of stops on the smallest rural route in the system.

5. Is the Postal Service considering any change in its density requirements for mailers serving rural routes?

6. Please provide copies of any studies performed by the Postal Service updating the work by witness Buc in R90-1 on cost savings in high density mailings.

7. If there have been no studies since witness Buc's work, please confirm that the Postal Service relies upon that study as the basis for the requirements for high density mail. If you cannot confirm, please explain.